

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

FELICIA SANDERS, individually and as	)	
Legal Custodian of K.M., a minor,	)	Civil Action No. 2:16-cv-2356-RMG
	)	
Plaintiff,	)	<i>consolidated with</i> 2:16-cv-2350; 2:16-cv-
	)	2351; 2:16-cv-2352; 2:16-cv-2354; 2:16-cv-
v.	)	2355; 2:16-cv-2357; 2:16-cv-2358; 2:16-cv-
	)	2359; 2:16-cv-2360; 2:16-cv-2405; 2:16-cv-
THE UNITED STATES OF AMERICA,	)	2406; 2:16-cv-2407; 2:16-cv-2409; and
	)	2:16-cv-2746
Defendant.	)	
	)	
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This document pertains to all cases	)	
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**SECOND RENEWED MOTION TO DISMISS**

The United States hereby moves, pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, and Local Civ. Rule 7.01 (D.S.C.), to dismiss these actions for lack of subject matter jurisdiction and failure to state a claim upon which relief can be granted. The grounds for this motion are more fully set forth in the accompanying memorandum of points and authorities, which is incorporated herein by reference. This motion is supported by the concurrently filed memorandum of points and authorities, all arguments advanced in reply, and any additional arguments or evidence submitted with leave of Court.

Dated: December 13, 2019,

Respectfully submitted,

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THOMAS G. WARD  
Deputy Assistant Attorney General  
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JAMES G. TOUHEY, JR.  
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s/ Stephen R. Terrell  
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